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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

KENNETH GOULD,

Defendant.

No. 1:21-cr-00243-JLT-SKO

No. 1:25-mc-00066 EPG

**MOTION TO WITHDRAWL AS RETAINED  
COUNSEL; ORDER**

On October 7, 2021, Kenneth Gould was federally indicted. On September 6, 2023, undersigned counsel substituted in as retained counsel. On June 2, 2025, Mr. Gould was sentenced pursuant to a plea agreement. As of Mr. Gould's sentencing, undersigned counsel fulfilled his obligations under the retainer agreement.

On August 22, 2025, the government filed an application for writ garnishment and writ of continuing garnishment pertaining to Raymond James & Associates, case 1:25-mc-00066. Under the terms of the retainer agreement, counsel's services do not include representation regarding writs or appeals. However, as a courtesy, on August 27, 2025, undersigned counsel filed a motion to quash the writ of continuing garnishment and writ of continuing garnishment regarding Raymond James & Associates in the above entitled action and case 1:25-mc-00066.

On September 2, 2025, the government filed an application for writ of garnishment and on September 3, 2025, a writ of continuing garnishment regarding Ally Bank, case #1:25-mc-

00073. On September 8, 2025, in the above entitled matter, the government filed a notice of related cases pertaining to the writ of garnishment in cases 1:25-mc-00066 (Raymond James & Associates) and case 1:25-mc-00073 (Ally Bank).

Undersigned counsel now moves to withdraw as attorney of record. Mr. Gould is unable to afford representation by a privately retained attorney regarding the government's applications for garnishment and writs of continuing garnishment. I informed Mr. Gould that I intend to withdraw and that the Federal Defender of the Eastern District of California is willing to appoint counsel on his behalf regarding government applications for garnishment and writs of continuing garnishment. Mr. Gould is scheduled to surrender on September 11, 2025, for service of a term of imprisonment and has currently been designated to serve said term at FCI Lompoc's minimum security satellite camp, located at 3901 Klein Blvd, Lompoc, CA 93436.

I request leave of court to withdraw representation of Kenneth Gould. Counsel does not believe that permitting him to withdraw will be unduly prejudicial to the defendant. Should the Federal Defender's Office elect to appoint undersigned counsel CJA counsel, undersigned counsel requests a *nunc pro tunc* order effective August 22, 2025.

Dated: September 8, 2025

Respectfully submitted,

/s/ Marc Days  
MARC DAYS  
Attorneys for Defendant  
KENNETH GOULD

### ORDER

Having reviewed the motion and found that attorney Marc Days has completed the services for which he was retained, the Court hereby grants attorney Marc Days' motion to withdraw as counsel. Should Defendant seek further legal assistance, Defendant is advised to contact the Office of the Federal Defender for the Eastern District of California at 2300 Tulare Street, Suite 330, Fresno, CA 93721. The phone number for the office is (559) 487-5561 (collect) or (855) 656-4300 (toll-free). If appropriate, the office will arrange for the appointment of counsel to assist Defendant.

1 The Clerk of the Court is directed to serve a copy of this order on Kenneth Gould at the  
2 following address and to update the docket to reflect Defendant's pro se status and contact  
3 information.

4 Kenneth Gould  
5 FCI Lompoc minimum security satellite camp  
6 3901 Klein Blvd,  
Lompoc, CA 93436.

7  
8 IT IS SO ORDERED.

9 Dated: September 9, 2025

  
UNITED STATES DISTRICT JUDGE